

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

v.

LINDA MCMAHON, *et al.*,

Defendants.

Civil Action No. 1:25-cv-00329
District Judge Melissa R. DuBose
Magistrate Judge Patricia A. Sullivan

**JOINT MOTION TO EXTEND BRIEFING SCHEDULE REGARDING
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

Defendants and Plaintiffs (together, “Parties”) respectfully move the Court to extend the current briefing schedule regarding Plaintiffs’ Motion for Preliminary Injunction.

1. Plaintiffs filed their Complaint, *see* ECF No. 1, and a Motion for Preliminary Injunction (“PI Motion”), *see* ECF No. 2, on the Court’s ECF system on July 14, 2025. The PI Motion asked the Court to enjoin the Government from freezing education-related funding that Plaintiffs had expected to receive on July 1, 2025. *See generally* ECF No. 2.

2. On July 22, 2025, the Parties jointly moved for a briefing schedule whereby Defendants’ response to the PI Motion would be due July 31, 2025, and Plaintiffs’ reply would be due August 7, 2025. ECF No. 51. The Court granted the Parties’ motion and set a hearing on the PI Motion for August 13, 2025.

3. On Friday, July 25, 2025, the Government announced that all the frozen funds at issue in the PI Motion would be released. As of this filing, at least some Plaintiff States are still waiting

for their Grant Award Notifications (GANs) and for funds to be available for the programs at issue in this litigation.

4. Defendants have represented to Plaintiffs that substantial funds will become available to Plaintiffs by today (July 30, 2025), and that they anticipate all funds at issue becoming available to Plaintiffs no later than Friday of this week.

5. Based on Defendants' representations, Plaintiffs consent to an extension of Defendants' deadline by which to respond to Plaintiffs' PI Motion to August 5, 2025, and accordingly, an extension of Plaintiffs' deadline by which to file a Reply to August 12, 2025.

6. Plaintiffs request that the Court schedule a hearing for their PI Motion at the Court's earliest convenience thereafter, and no later than August 20, 2025. Plaintiffs will notify the Court if they believe that a hearing on the PI Motion is unnecessary following a review of the GANs once they are awarded.

7. Based on the foregoing agreements, the parties respectfully request that the Court grant this joint motion for an extension of the PI Motion briefing schedule.

Respectfully submitted,

Dated: July 30, 2025

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